

**Federal Defenders
OF NEW YORK, INC.**

Leonard F. Joy
Executive Director

August 20, 2007

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Southern District of New York
John J. Byrnes
Attorney-in-Charge

BY FACSIMILE

Hon. Sidney H. Stein
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

RECEIVE

8/20/2007

Re: United States v. Edy Cabreja-Figueroa

No. 07 Cr. 628 (NRB)

Request for Adjournment, on Consent

CHAMBER

JUDGEMENT

Dear Judge Stein:

At the first pretrial conference in this case, the Court directed that any pretrial motions be filed by August 23, 2007, and scheduled a conference for that afternoon. I am planning to file a motion pursuant to 8 U.S.C. § 1326(d) on Mr. Cabreja-Figueroa's behalf but, due to the complexity of the issues, need approximately two weeks' additional time to complete it. Accordingly, I am writing to respectfully request that the Court extend the motion deadline until Friday, September 7, 2007, and that the Court re-schedule the conference for that day or a date convenient to the Court shortly thereafter.

I have spoken with Assistant United States Attorney Antonia Apps, who consents to the requested adjournment. In addition, the defense consents to an exclusion of time under the Speedy Trial Act until the adjourned date.

Respectfully submitted,

STEVEN M. STATSINGER

Assistant Federal Defender
(212) 417-8736

cc: AUSA Antonia Apps

8/20/07

8/20/07
Motion deadline extended to 9/7/07;
Motion deadline extended from 8/23/07 until 9/7/07
conferred from 8/23/07 until 9/7/07
at 2 p.m. The excluded pursuant to
18 U.S.C. § 1611(h)(8)(A) for 8/20/07 until
9/7/07. The ends of justice outweigh the
public + the def. in a speedy trial.
Searched
INDEXED
FILED
TOTAL P:002